

Robert A. Julian (SBN 88469)
Cecily A. Dumas (SBN 111449)
BAKER & HOSTETLER LLP
1160 Battery Street, Suite 100
San Francisco, CA 94111
Telephone: 628.208.6434
Facsimile: 310.820.8859
Email: rjulian@bakerlaw.com
Email: cdumas@bakerlaw.com

Michael A. Kelly (SBN 71460)
WALKUP, MELODIA, KELLY &
SCHOENBERGER
650 California Street, 26th Floor
San Francisco, CA 94108
Telephone: 415.981.7210
Facsimile: 415.391.6965
Email: mkelly@walkuplawoffice.com

Eric E. Sagerman (SBN 155496)
Lauren T. Attard (SBN 320898)
BAKER & HOSTETLER LLP
11601 Wilshire Boulevard
Suite 1400
Los Angeles, CA 90025
Telephone: 310.820.8800
Facsimile: 310.820.8859
Email: esagerman@bakerlaw.com
Email: lattard@bakerlaw.com

Frank M. Pitre (SBN 100077)
COTCHETT, PITRE & MCCARTHY, LLP
840 Malcolm Road, Suite 200
Burlingame, CA 94010
Telephone: 650.697.6000
Facsimile: 650.697.0577
Email: fpitre@cpmlegal.com

*Counsel for Official Committee of Tort
Claimants*

*Co-lead counsel in Judicial Council
Coordination Proceeding entitled California
North Bay Fire Cases, JCCP No. 4955*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

Case No. 19-30088 (DM)

PG&E CORPORATION

Chapter 11

-and-

(Lead Case)

**PACIFIC GAS AND ELECTRIC
COMPANY,**

(Jointly Administered)

Debtors

- ☐ Affects PG& E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

**All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

**AMENDED JOINDER OF CO-LEAD
COUNSEL TO THE NORTH BAY FIRE
CASES, JCCP 4955, ON BEHALF OF THE
TUBBS PREFERENCE PLAINTIFFS, TO
AMENDED MOTION OF THE OFFICIAL
COMMITTEE OF TORT CLAIMANTS
FOR RELIEF FROM AUTOMATIC STAY
TO PERMIT STATE COURT JURY
TRIAL OF 2017 TUBBS WILDFIRE
CLAIMS**

Date: July 24, 2019
Time: 9:30 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16 Floor
San Francisco, CA 94102

1 Michael A. Kelly, of Walkup, Melodia, Kelly & Schoenberger, and Frank M. Pitre of
2 Cotchett, Pitre & McCarthy, LLP, in their capacity as co-lead counsel¹ in the Judicial Council
3 Coordination Proceeding entitled California North Bay Fire Cases, JCCP No. 4955, pending in the
4 Superior Court of California for the County of San Francisco, on behalf of Barbara Thompson,
5 John Caslin, Elizabeth Fourkas, Phyllis Lowe, Raymond Breitenstein, Don Louis Kamprath,
6 Raleigh Fohrman, William Edelen, Greg and Christina Wilson, Monte Kirven, and Carmen and
7 Armando Berriz (together, the “**Tubbs Preference Plaintiffs**”), hereby join, as moving parties, the
8 amended motion (the “**Motion**”) of the Official Committee of Tort Claimants (“**TCC**”) in the
9 above-captioned chapter 11 cases of PG&E Corporation and Pacific Gas and Electric Company
10 (collectively, the “**Debtors**”) pursuant to sections 362(d)(1) of title 11 of the United States Code
11 sections 1334(c) and 1452(b) of title 28, Rules 4001 and 5011(b) of the Federal Rules of Bankruptcy
12 Procedure and Rule 4004-1 of the Bankruptcy Local Rules for the United States District Court for
13 the Northern District of California, for entry of an order terminating the automatic stay to permit
14 the claims of the Tubbs Preference Plaintiffs to proceed to a jury trial on their personal injury,
15 wrongful death and related property damage claims against the Debtors arising from the 2017
16 Tubbs Fire in the Superior Court of California for the County of San Francisco, as set forth in their
17 Complaints against the Debtors, as may be amended, and to request the Court in the California
18 North Bay Fire Cases, JCCP 4955, to order the Tubbs Fire Claims to trial with preference pursuant
19 to Code of Civil Procedure section 36.

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21 *[remainder of page intentionally left blank]*
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28 ¹ The Court in JCCP 4955 appointed Mr. Kelly and Mr. Pitre co-lead counsel in Case Management Order No.1, dated March 6, 2018, attached as Exhibit A to the Amended Declaration of Michael A. Kelly, filed contemporaneously herewith.

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The TCC supports this joinder to its Motion.

Dated: July 9, 2019

BAKER & HOSTETLER LLP

By: /s/ Robert A. Julian
Robert A. Julian

*Counsel for The Official Committee of Tort
Claimants*

WALKUP, MELODIA, KELLY &
SCHOENBERGER

By: 
Michael A. Kelly

*Co-lead counsel in North Bay Fire Cases,
JCCP No. 4955*

COTCHETT, PITRE & MCCARTHY, LLP

By: 
Frank M. Pitre

*Co-lead counsel in North Bay Fire Cases,
JCCP No. 4955*